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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: TFT-LCD (FLAT PANEL)
 ANTITRUST LITIGATION

Master File No. 3:07-md-1827-SI
 (Case No. 2:11-cv-03856-SI)

This Document Relates to:

**STIPULATION AND [PROPOSED]
 ORDER REGARDING RULE 30(B)(6)
 DEPOSITION OF SANYO CONSUMER
 ELECTRONICS CO., LTD AND FACT
 DISCOVERY CUT-OFF**

Motorola, Inc. v. AU Optronics Corporation,
 et al., 3:09-cv-5840 SI

AT&T Mobility LLC, et al. v. AU Optronics
Corporation, et al., 3:09-cv-4997 SI

Target Corporation, et al., v. AU Optronics
Corporation, et al., 3:10-cv-4945 SI

Defendant SANYO Consumer Electronics Co., Ltd., (“Sanyo Consumer Electronics”) and
 Plaintiffs Motorola Mobility, Inc.; AT&T Mobility LLC; AT&T Corp.; AT&T Services, Inc.;
 Bellsouth Telecommunication, Inc.; Pacific Bell Telephone Company; AT&T Operations, Inc.;
 AT&T Datacomm, Inc.; Southwestern Bell Telephone Company; Target Corp.; Sears, Roebuck and

1 Co.; Kmart Corp.; Old Comp Inc.; Good Guys, Inc.; RadioShack Corp; and Newegg Inc.;
2 ("Plaintiffs") stipulate as follows:

3 WHEREAS on November 2, 2011, Plaintiffs made a request to Sanyo Consumer Electronics
4 to take a Rule 30(b)(6) deposition of Sanyo Consumer Electronics;

5 WHEREAS the discovery cut-off in the Direct Action Plaintiffs' track one cases is
6 December 8, 2011;

7 WHEREAS Plaintiffs first named Sanyo Consumer Electronics in their respective
8 Complaints only recently;

9 WHEREAS the parties have had limited time to conduct discovery;

10 WHEREAS Plaintiffs and Sanyo Consumer Electronics have met and conferred regarding
11 scheduling the Rule 30(b)(6) deposition of Sanyo Consumer Electronics; and

12 WHEREAS the Rule 30(b)(6) deponent for Sanyo Consumer Electronics resides in Tottori,
13 Japan and will be traveling a significant distance to San Francisco in order to attend the deposition;

14 THEREFORE, Sanyo Consumer Electronics, by its counsel, and Plaintiffs, by the
15 undersigned counsel, stipulate and agree as follows:

16 1. The fact discovery cutoff date of December 8, 2011 set forth in the Order Modifying
17 Pretrial Schedule for "Track One" Direct Action Plaintiff and State Attorney General Cases (MDL
18 Dkt. No. 3110) is extended up to and including December 15, 2011, solely as to the deposition of
19 Yasushi Nakao, the designated Rule 30(b)(6) deponent for Sanyo Consumer Electronics.

20 2. This deposition shall take place on December 14-15, 2011 at the offices of Davis
21 Wright Tremaine LLP in San Francisco.

22 3. Sanyo Consumer Electronics and Plaintiffs have on-going disputes over the
23 appropriate scope of this deposition. Discussions regarding these issues are continuing and the
24 parties hope that they will be able to reach agreement. If not, any remaining disputes will be
25 presented to the Special Master. If any disputes arise at the deposition, Plaintiffs will have five
26 court days to move to compel further responses.

1 **IT IS SO STIPULATED.**

2 DATED: November 29, 2011

/s/ Allison A. Davis

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Counsel for Plaintiffs Motorola Mobility Inc.; AT&T Mobility LLC, et al.; Target Corporation, et al.

Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the filing of this document has been obtained from stipulating defendants.


1 **IT IS SO RECOMMENDED.**

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3 Dated: 11/29, 2011

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5 _____
6 Martin Quinn, Special Master

7 **IT IS SO ORDERED.**

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9 Dated: 11/30, 2011

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11 _____
12 Hon. Susan Illston, United States District Judge

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DAVIS WRIGHT TREMAINE LLP